CAR 000 052 142.
Part C 4K-

Matthew Rodriguez
Secretary for
Environmental Protection

Department of Toxic Substances Control

Deborah O. Raphael, Director
700 Heinz Avenue
Berkeley, California 94710

Edmund G Brown Jr
Governor

MEMORANDUM

TO: Chand Sultana, Ph.D.
Project Manager
Brownfields and Environmental Restoration Program
Chatsworth Office

FROM: Brian Endlich, Ph.D.
Staff Toxicologist
Human and Ecological Risk Office (HERO)
Brownfields and Environmental Restoration Program
Berkeley Office

DATE: July 17, 2013

SUBJECT: Former Pechiney Cast Plate, Inc., Facility, 3200 Fruitland Avenue, Vernon, California

Groundwater Monitoring Report First Quarter 2013

PCA: 11019 Site: 301396-00

Per your request the Human and Ecological Risk Office (HERO) has reviewed the following document:

Groundwater Monitoring Report, First Quarter 2013 for the Former Pechiney Cast Plate, Inc. Facility, 3200 Fruitland Avenue, Vernon, California prepared for the Pechiney Cast Plate Inc., Vernon, California by AMEC Geomatrix, Inc., Newport Beach, California with a cover date of June 17, 2013.

Comments on the Groundwater Monitoring Report are described below.

Background

The Former Pechiney Cast Plate Inc., (Site) facility located at 3200 Fruitland Avenue in Vernon was once part of a 56-acre aluminum manufacturing facility operated by Alcoa since the late 1930s. Alcoa used fuels and Stoddard solvent which were stored in Underground Storage Tanks (USTs). Alcoa also operated processes which required lubricating oils and generated hazardous waste that was stored at various locations on the Site. Pechiney purchased the Site in 1997. Alcoa investigated subsurface conditions and

conducted limited remediation as part of the closure of its Hazardous and Environmental Chemicals Permit from the City of Vernon.

The Site is comprised of approximately 26.9 acres and was formerly occupied by an approximately 600,000 square foot building. The above ground structures were demolished in 2006. Future removal of building slabs, pavement, and below-grade man-made structures and other structures located adjacent to the former buildings are planned. The Site is zoned for industrial use. The City of Vernon is in the process of purchasing the property and the long-term use planned for the Site includes construction of a power plant. The chemicals of potential concern (COPCs) include metals, volatile organic compounds (VOCs) including chlorinated solvents, total petroleum hydrocarbons including Stoddard solvents, and polychlorinated biphenyls (PCBs).

The Groundwater Monitoring report describes a summary of activities conducted in concordance with the Remedial Action Plan submitted by AMEC in 2012.

Scope of Review

HERO has reviewed this document with emphasis on those aspects that affect the risk to human health. HERO's review addressed issues concerning sampling and analysis, reporting, and calculation of screening level risk (potential cancer risk and hazard indices). The purpose of the Groundwater Monitoring Report is to provide risk managers with sufficient information to support decision-making. Minor grammatical or typographical errors that do not affect the evaluation have not been noted.

General Comments

1. The Groundwater Monitoring Report is generally well written but contains sections which require some revision for purposes of clarification. A number of specific comments are provided below to aid in revision of the document.

Specific Comments

1. Section 3.0 Summary of Findings: This section would benefit from an expansion of the concept of a summary. Please add narrative which describes the findings and conclusion of these investigations. You should provide the reviewer with a synopsis of the results. It is not helpful to the reader for the report to refer to data provided in appendices with no explanation of what these results are. When a summary is written in the style this one is, it forces the reviewer to go to a different part of the document, read and analyze the data and then draw their own conclusions. For instance, several bulleted paragraphs are presented but there is no discussion of whether the most recent data is the first data for this parameter, or whether it is new data that is the same or different from previous data.

Groundwater analytical results for natural attenuation are mentioned in the fifth (unnumbered) bullet of this section. Please explain the findings and relate the groundwater chemistry results to whether the existing conditions will facilitate bacteria mediated natural attenuation or if non-biological attenuation is hypothesized to be the primary process.

The final paragraph of this section refers to TCE contamination which may be coming from an offsite source, however the terminology "northwest corner" of the site appears to be used to describe two different places and this is confusing. Please revise this section to be clearer.

2. Figure 2 Groundwater Elevations and Selected VOC concentrations in Groundwater: The part of the legend which contains the units of concentration for the VOC detections on this figure should be made more prominent. Please revise the figure to include the units in the data boxes and list applicable screening standards, such as maximum contaminant levels (MCLs).

Editorial comments:

1. Bulleted items: Bulleted items should be avoided because they are difficult to describe when the subject of a comment by a reviewer. All subsections should be appropriately numbered.

Conclusions and Recommendations

HERO identified deficiencies in the Groundwater Monitoring Report First Quarter 2013 and suggested appropriate revisions. These comments are meant to be constructive and we hope they are useful. The recommendations provided in this memo are meant to be site specific and are not to be construed as DTSC policy. If you have additional questions please feel free to contact Dr. Brian Endlich at (510) 540-3804 or endlich.brian@dtsc.ca.gov.

Reviewed by: William S. Bosan, Ph.D.
Senior Toxicologist
Southern California Unit Chief
Human and Ecological Risk Office
Cypress Office